

# EXHIBIT C

**FILED**  
KING COUNTY WASHINGTON

MAY 28 2025

SUPERIOR COURT CLERK

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

CITY HEIGHTS HOLDINGS, LLC, a  
Washington limited liability company,

Plaintiff,

v.

CITY OF CLE ELUM, a Washington  
municipal corporation,

Defendant,

v.

UMPQUA BANK,

Garnishee.

NO. 24-2-25775-6 SEA

APPLICATION FOR WRIT OF  
GARNISHMENT (for lesser amount)

☒ **NOT A CONSUMER DEBT  
JUDGMENT**

☐ This garnishment is based on a judgment  
or order for:

- ☐ child support
- ☐ private student loan debt
- ☐ consumer debt

The undersigned states:

Submitted herewith is the fee provided by RCW 36.18.020 [RCW 3.62.060 – if District  
Court] payable to the Clerk of the above-entitled Court:

As attorney for the **Judgment Creditor**/plaintiff in the above-captioned matter I make  
this application for a Writ of Garnishment on **Judgment Creditor's** behalf.

The facts are stated as follows:

1. **Judgment Creditor** has a judgment wholly or partially unsatisfied, against the  
**Judgment Debtor**/defendant, in the above-matter, entered in the above-entitled Court on  
December 9, 2024, as amended on May 12, 2025. **Judgment Debtor** has:

- ☒ made no payments whatsoever.
- ☐ made partial payments as follows:

APPLICATION FOR WRIT OF GARNISHMENT (for lesser amount)

- 1

**Green & Norwood PLLC**  
2284 W. Commodore Way, Suite 300  
Seattle, Washington 98199  
(206) 420-3486

2948-101

1           2.       The amount alleged to be due and still owing under said amended judgment is  
2 \$25,987,198.38, plus interest, attorney's fees and costs. But for purposes of this Writ,  
Judgment Creditor is only seeking to garnish the lesser sum of \$232,000.00.

3           3.       **Judgment Creditor** has reason to believe and does believe, that the above-  
4 named **Garnishee**, whose residence and/or business address in King County, Washington, is:

5                   ☒       indebted to the **Judgment Debtor** in amounts exceeding those exempted  
6 from garnishment by any state or federal law;

7                   ☒       has possession or control of personal property or effects belonging to the  
8 **Judgment Debtor** which are not exempted from garnishment by any state or federal law.

9           4.       The above-named Garnishee is believed to be:

10                   ☐       the employer of the **Judgment Debtor**.  
11                   ☒       not the employer of the **Judgment Debtor**.

12           The undersigned certifies under penalty of perjury under the laws of the State of  
13 Washington that the foregoing is true and correct.

14           Dated: May 28, 2025.

15           Place: Seattle, Washington

16                   s/  
17                   Matthew D. Green, WSBA #18046  
18                   Elizabeth Hebener-Norwood, WSBA #40930  
19                   Attorneys for Judgment Creditor  
20                   GREEN & NORWOOD PLLC  
21                   2284 W. Commodore Way, Suite 300  
22                   Seattle, WA 98199  
23                   Telephone: (206) 420-3486  
24                   Email: matt@gnlawseattle.com  
25                   elizabeth@gnlawseattle.com

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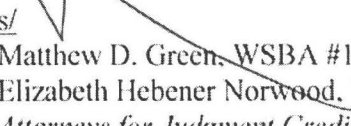
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